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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MELISSA A. SIMMONS

Plaintiff,

v.

MICHELLE KING,  
Acting Commissioner of Social Security,<sup>1</sup>

Defendant.

Case No.: 2:24-cv-01968-JCM-DJA

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant, Michelle King, Acting Commissioner of Social Security (Defendant), respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Brief (Dkt. No. 14, filed on January 13, 2025), currently due on February 12, 2025, by 30 days, through and including March 14, 2025. Defendant further requests that the deadline for Plaintiff's optional reply brief be extended to March 28, 2025.

<sup>1</sup> Michelle King became the Acting Commissioner of Social Security on January 20, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Michelle King should be substituted for Carolyn Colvin as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 This is Defendant's first request for an extension of time to file a response. Good cause exists  
2 for this extension. Counsel is currently in the process of determining whether a settlement agreement  
3 is possible in this case. Additional time is required for Defendant's undersigned counsel and  
4 specialized attorneys within the undersigned's office to consider this option. If the case cannot be  
5 settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Brief by  
6 the new due date of March 14, 2025. Counsel for Defendant advised counsel for Plaintiff of the need  
7 for this extension on February 10, 2025. Counsel for Plaintiff confirmed that Plaintiff does not object  
8 to this request.

9 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's  
10 Brief, through and including March 14, 2025. This request is made in good faith and with no intention  
11 to unduly delay the proceedings.

12  
13 Dated: February 10, 2025

Respectfully submitted,

14 SUE FAHAMI  
Acting United States Attorney

15 /s/ David Priddy  
16 DAVID PRIDDY  
Special Assistant United States Attorney

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20 IT IS SO ORDERED:

21   
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: 2/11/2025  
24  
25  
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**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

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Attorneys for Plaintiff

Dated: February 10, 2025

/s/ David Priddy  
DAVID PRIDDY  
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